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11 BANK OF AMERICA, N.A.

12 *(Additional counsel appear on following page)*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15
16 MAUREEN CLARK and SONYA
17 ALEXANDER, individually, and on
18 behalf of all others similarly situated,

19 Plaintiff,

20 vs.

21 BANK OF AMERICA N.A.

22 Defendant.

CASE NO. 2:16-cv-02228-GMN-VCF

**JOINT STIPULATION TO
CONTINUE DEADLINE TO FILE
PROPOSED PLAN**

Complaint Filed: September 21, 2016

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17 *Attorneys for Plaintiffs* MAUREEN CLARK and
18 SONYA ALEXANDER
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1 WHEREAS, immediately after the Thanksgiving holiday weekend,
2 Defendant's lead counsel became engaged in jury duty, which is expected to last for
3 at least another five-to-seven days, and, consequently, the Parties need additional
4 time to meet and confer to attempt to narrow or eliminate their areas of
5 disagreement about certain aspects of the Proposed Plan before finalizing and filing
6 it, which the Parties are confident will be accomplished by December 13, 2019;

7
8 WHEREAS, in light of the pending mediator's proposal and the contingent
9 possibility of settlement on or by January 20, 2020, the Scheduling Order to be
10 entered by the Court may become moot issue; and

11
12 WHEREAS, in light of all of the foregoing, the Parties have conferred and
13 agree that good cause exists to continue the deadline for filing the Proposed Plan
14 from December 4, 2019 to December 13, 2019.

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STIPULATION

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, through their respective undersigned counsel, and for good cause, that upon entry of an Order by the Court approving this Stipulation:

- (1) The Parties’ deadline for filing a joint discovery plan and scheduling order is continued from December 4, 2019 to December 13, 2019.
- (2) By entering into this Stipulation, the Parties do not waive and expressly reserve all claims, defenses and challenges in this.

IT IS SO STIPULATED AND AGREED.

DATED: December 4, 2019 **McGUIREWOODS LLP**

By: /s/ Michael Mandel
Michael Mandel, Esq.

Attorneys for Defendant
BANK OF AMERICA, N.A.

DATED: December 4, 2019 **WOLF, RIFKIN, SHAPIRO, SCHULMAN
& RABKIN, LLP**

By: /s/ Don Springmeyer
Don Springmeyer, Esq.

Attorneys for Plaintiffs
MAUREEN CLARK and SONYA
ALEXANDER

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CASE NO. 2:16-cv-02228-GMN-VCF

**ORDER GRANTING JOINT
STIPULATION TO CONTINUE
DEADLINE TO FILE PROPOSED
DISCOVERY PLAN AND
SCHEDULING ORDER**

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